

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

IN RE:)	Case No. 19-24857-CMB
)	
Nakia Henderson)	Chapter 13
Debtor)	
)	Claim. No.: 11
Nakia Henderson)	
Movant)	
)	
v.)	
)	
Deutsche Bank National Trust Co., etal)	
Ronda J. Winnecour, Trustee)	
Respondent(s))	

DECLARATION

I, Albert G. Reese Jr., Esquire, attorney for the above-referenced Debtor, hereby submit this formal written Declaration that the existing Chapter 13 Plan is sufficient to fund the plan with the modified debt for the following reason:

Pursuant to Deutsche Bank National Trust Co., etal's Notice of Mortgage Payment Change dated November 28, 2022, the Debtor's current escrow payment for account number ending in **2591** is **\$97.76**. The new escrow payment is **\$92.09**. The new total mortgage payment is **\$508.51** effective January 1, 2023. The Debtor's Chapter 13 Plan is sufficient.

Dated: **November 28, 2022**

Dated: **November 28, 2022**

Respectfully submitted by:

/s/ Nakia Henderson

Nakia Henderson

Respectfully submitted by:

/s/ Albert G. Reese, Jr., Esquire

Albert G. Reese, Jr., Esquire

Attorney for Debtor

PA ID #93813

640 Rodi Road, 2nd Floor, Suite 2

Pittsburgh, PA 15235

(412) 241-1697

(412) 241-1687(fax)

areese8897@aol.com